REMARKS:

In the Office Action the Examiner noted that claims 1-27 are pending in the application, and the Examiner rejected all claims.

By this Amendment, claims 1, 8, 17 and 20 have been amended. No new matter has been presented. The Examiner's rejections are traversed below, and reconsideration of all rejected claims is respectfully requested.

REJECTION UNDER 35 U.S.C. §103(a):

In item 2 on page 2 of the Office Action the Examiner rejected claims 1-27 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,269,336 (Ladd) in view of U.S. Patent No. 6,801,604 (Maes) in further view of U.S. Patent No. 6,185,535 (Hedin). The Applicants respectfully traverse the Examiner's rejections below.

The cited references, alone or in combination, do not teach or suggest "**selectively switching control** over user interaction between the first speech recognizer and the second speech recognizer **based on speech recognition executed at the second speech recognizer** using the augmenting grammar set" and "switching control over the user interaction **back to the portal** and performing subsequent speech recognition at the portal", as recited in claim 1 for example. See also claims 8, 17 and 20 recite similar features.

Similarly, claims 25 and 26 recite, "switching control of the caller interaction from the application server to the portal responsive to detection of an input corresponding to the grammar set via the second speech recognizer of the application server" and "returning control of the call back to the portal subsequent to determining that said input corresponds to the transferred grammar set based on the speech recognition by the application server."

Claim 27 recites, "determining an input from a caller matches a grammar set... during interaction of the caller controlled by an application server independent of voice recognition by the portal" and "implementing subsequent voice recognition via the portal by transferring control over interaction of the caller to the portal responsive to said determining."

Instead, Ladd is limited to a single recognizer (an automatic speech recognition (ASR) unit (254)) of the electronic network that processes speech communications and provides output result of the speech processing (see, col. 8, lines 55-67). The changing of the personalities/grammars discussed at col. 4, lines 32-35 of Ladd which the Examiner relies on as teaching the claimed "augmenting [of] the speech recognition system" are only for the

centralized speech recognition at the electronic network.

At least on page 3 of the outstanding Office Action, the Examiner asserts that Ladd teaches the claimed "notifying the portal... responsive to speech recognition via the second speech recognizer independent of the portal", as taught by the claimed invention (see claim 1 for example). However, also on page 3 of the same Office Action, the Examiner acknowledges that Ladd does not explicitly teach execution of the speech recognition independent of the portal. Essentially the Examiner is alleging that Ladd teaches the claimed notifying of the portal in response to speech recognition independent (outside) of the portal *and* acknowledging that Ladd does not teach speech recognition independent of the portal.

At least on page 13 of the outstanding Office Action, the Examiner alleges that Ladd teaches "transferring control" and the Examiner states, "Ladd's call control transfers the calls according to input (either pages or messages) and routes items either thru (a paging network or email network)." However, there is no teaching in Ladd that is directed to speech recognition by two *separate* and independent speech recognizers ("first and second speech recognizers" where control is returned to the first recognizer once speech recognition is performed by the second speech recognizer.

On the other hand, Maes is limited to allocating or distributing speech processing tasks to remote speech engines (see also, FIG. 8 and corresponding text) and the Hedin communication with a remote server is only when the system comes across unrecognized portions of an audio input, where the server part uses its own more powerful ASR to analyze the received speech (see, Fig. 5 including corresponding text). Meaning, there is no teaching of "switching control", as taught by the claimed invention.

Further, even assuming arguendo that Ladd, Maes, and Hedin did disclose the features discussed by the Examiner, the Applicants respectfully submit that there is no motivation to combine the cited references. The Examiner stated that the combination of the references would be obvious because it would make the system more robust to handle increased volume of recognition request.

However, absent hindsight, one of ordinary skill in the art would not be motivated to modify Ladd that is directed to centralized speech recognition with Maes and/or Hedin which the Examiner claims teach distributed and remote speech recognition processing tasks. In fact, the processing in Maes and Hedin teach away from the centralized speech recognition of Ladd.

Claims depending from the independent claims include all of the features of that claim plus additional features which are not disclosed by the cited references. For at least the reasons stated above, the dependent claims also patentably distinguish over the cited references.

Therefore, withdrawal of the rejection is respectfully requested.

CONCLUSION:

There being no further outstanding objections or rejections, it is respectfully submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: 01/09/2009

By: _____
Temnit Afework
Registration No. 58,202

1201 New York Ave, N.W., 7th Floor
Washington, D.C. 20005
Telephone: (202) 434-1500
Facsimile: (202) 434-1501